



December 15, 2008

Kevin J. Sweeney, Senior Entomologist
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001
+1 703 305 5063

RE: Application for "Natrapel 8 Hour Insect Repellent Continuous Spray" Registration
Number: 56575-RL

Dear Mr. Sweeney.

Enclosed please find the hard copies of the Formulator's Exemption Statement and Data Matrix for the above referenced subject sent to you previously in electronic format.

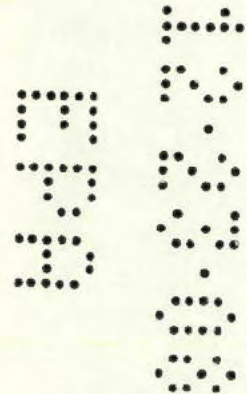
1. Formulator's Exemption Statement dated December 15, 2008
2. Two Copies of Data Matrix (EPA Form 8570-35) Agency Internal Use Copy
Pages 1 of 3, 2 of 3 and 3 of 3.
3. Two Copies of Data Matrix (EPA Form 8570-35) Public File Copy Pages 1 of 3,
2 of 3 and 3 of 3.

Please let me know if there is anything further that you need.

Sincerely,

A handwritten signature in black ink, appearing to read "Vern Schrum".

Vern Schrum
Regulatory Affairs Manager
603-837-0200, vschrum@tendercorp.com



TENDER CORPORATION

P.O. Box 290 • Littleton Industrial Park
Littleton, New Hampshire 03561 USA
603 444-5464 • 800 258-4696 • FAX 603 444-6735
www.tendercorp.com



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
 (40 CFR 152.85)

Applicant's Name and Address Tender Corporation 106 Burndy Road Littleton, NH 03561	EPA File Symbol/Registration Number 56575-
	Product Name Natrapel 8 Hour Insect Repellent Continuous Spray
	Date of Confidential Statement of Formula (EPA Form 8570-4) 08/21/2008

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Picaridin, 1-methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Picaridin, 1-methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate	[REDACTED]	[REDACTED]
Signature 	Name and Title Vern Schrum Regulatory Manager	Date 12/15/2008

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
 Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment

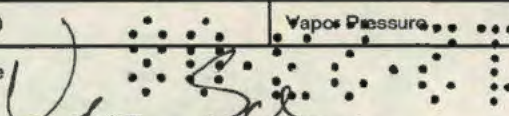


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 8/21/2008		EPA Reg No./File Symbol 56575		Page 1 of 3	
Applicant's/Registrant's Name & Address Tender Corporation 106 Bumdy Road, Littleton NH, 03561		Product Natranel 8 Hour Insect Repellent Continuous Spray			
Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Chemical Identity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1600	Starting Material & Manufacturing Process	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1670	Discussion of Formulation of Impurities	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1700	Preliminary Analysis	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1750	Certified Limits	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1800	Enforcement Analytical Method	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6302	Color	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6303	Physical State	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6304	Odor	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7200	Melting Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7220	Boiling Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7300	Density / Bulk Density	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7840	Solubility (Generation Elution)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7860	Solubility (Generation Column)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7950	Vapor Pressure	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature 			Name and Title Vern Schrum Regulatory Affairs Manager		Date 12/15/2008



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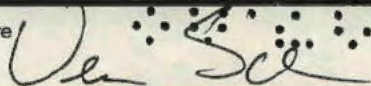
Applicant's/Registrant's Name & Address

Tender Corporation 106 Bumdy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Lanxess Corporation EPA Co. No. 39967	EXC	
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			Lanxess Corporation EPA Co. No. 39967	EXC	
Signature			Name and Title		Date
			Vern Schrum Regulatory Affairs Manager		12/15/2008

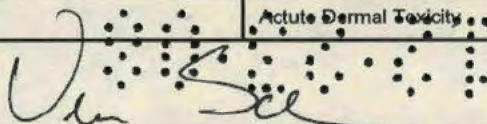


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Date 8/21/2008		EPA Reg No./File Symbol 5657S		Page 2 of 3	
Applicant's/Registrant's Name & Address Tender Corporation 106 Burndy Road, Littleton NH, 03561		Product Natrapel 8 Hour Insect Repellent Continuous Spray			
Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7370	Dissociation Constant	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7570	Octanol / Water Partition Coefficient	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7000	pH	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6313	Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6314	Oxidation / Reduction	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6315	Flammability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6316	Explosibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6317	Storage Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7100	Viscosity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6319	Miscibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6320	Corrosion Characteristic	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6321	Dielectric Breakdown Voltage	N/A	N/A		
158.340 GL REF	TOXICITY DATA REQUIREMENTS				
81-1	Acute Oral Toxicity-rat	44408748	Lanxess Corporation EPA Co. No. 39967	EXC	
81-2	Acute Dermal Toxicity	44408749	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature 			Name and Title Vern Schrum Regulatory Affairs Manager		Date 12/15/2008



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Applicant's/Registrant's Name & Address

Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			Lanxess Corporation EPA Co. No. 39967	EXC	
			Lanxess Corporation EPA Co. No. 39967	EXC	
			N/A		
			Lanxess Corporation EPA Co. No. 39967	EXC	
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Signature			Name and Title		Date
			Vern Schrum Regulatory Affairs Manager		12/15/2008



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Applicant's/Registrant's Name & Address Tender Corporation 106 Burndy Road, Littleton NH, 03561		Product Natrapel 8 Hour Insect Repellent Continuous Spray			
Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1200	Acute Dermal Irritation-Rabbit	44408749	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1300	Acute Inhalation Toxicity - Rat	45034002	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2400	Primary Eye Irritation - Rabbit	46885001	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2500	Primary Dermal Irritation	44408751	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2600	Dermal Sensitization - G. Pigs	44408752	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040901	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040601	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040602	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040603	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature	Name and Title Vern Schrum Regulatory Affairs Manager		Date 12/15/2008		



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Applicant's/Registrant's Name & Address

Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

Lanxess Corporation EPA Co. No. 39967

EXC

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Lanxess Corporation EPA Co. No. 39967

EXC

Signature

Name and Title

Vern Schrum Regulatory Affairs Manager

Date

12/15/2008




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Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Chemical Identity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1600	Starting Material & Manufacturing Process	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1670	Discussion of Formulation of Impurities	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1700	Preliminary Analysis	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
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830.6302	Color	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6303	Physical State	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6304	Odor	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7200	Melting Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7220	Boiling Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7300	Density / Bulk Density	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7840	Solubility (Generation Elution)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7860	Solubility (Generation Column)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7950	Vapor Pressure	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature 			Name and Title Vern Schrum Regulatory Affairs Manager		Date 12/15/2008

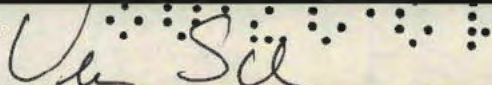


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Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7					
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Signature 	Name and Title Vern Schrum Regulatory Affairs Manager			Date 12/15/2008	



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Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

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Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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830.7570	Octanol / Water Partition Coefficient	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7000	pH	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6313	Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6314	Oxidation / Reduction	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6315	Flammability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6316	Explosibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6317	Storage Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7100	Viscosity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6319	Miscibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6320	Corrosion Characteristic	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6321	Dielectric Breakdown Voltage	N/A	N/A		
158.340 GL REF	TOXICITY DATA REQUIREMENTS				
81-1	Acute Oral Toxicity-rat	44408748	Lanxess Corporation EPA Co. No. 39967	EXC	
81-2	Acute Dermal Toxicity	44408749	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature	Name and Title		Date		
	Vern Schrum Regulatory Affairs Manager		12/15/2008		



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Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natranel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1200	Acute Dermal Irritation-Rabbit	44408749	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1300	Acute Inhalation Toxicity - Rat	45034002	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2400	Primary Eye Irritation - Rabbit	46885001	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2500	Primary Dermal Irritation	44408751	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2600	Dermal Sensitization - G. Pigs	44408752	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040901	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040601	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040602	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040603	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature	Vern Schrum			Name and Title Vern Schrum Regulatory Affairs Manager	Date 12/15/2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 8/21/2008

EPA Reg No./File Symbol 56575

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Applicant's/Registrant's Name & Address

Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

Lanxess Corporation EPA Co. No. 39967

EXC

Lanxess Corporation EPA Co. No. 39967

EXC

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Lanxess Corporation EPA Co. No. 39967

EXC

Lanxess Corporation EPA Co. No. 39967

EXC

Signature

Vern Schrum

Name and Title

Vern Schrum

Regulatory Affairs Manager

Date

12/15/2008



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg. Number:
56575-15

Date of Issuance:
DEC 15 2008

Term of Issuance:
Conditional

Name of Pesticide Product:
Natrapel 8 hour Insect Repellent
Continuous Spray

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):

Tender Corporation.
106 Burndy Road
Littleton, New Hampshire 03561

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided:

1. You will submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. You make the following label changes before releasing the product for shipment:
 - a) Revise the EPA Registration Number to read "EPA Reg. No. 56575-15".
 - b) Add an emergency medical information contact telephone number.

Continued on the next page

Signature of Approving Official:

Richard Gebken, Product Manager (10), RD/IB (7505P)

Date:

12/15/2008

- c) According to your Confidential Statement of Formula your product is not pressurized. Revise the Physical Hazards Statement to read: "Flammable. Do not use or store near sparks or open flame. Do not smoke while applying." Note that you cannot market this product as an aerosol or in a pressurized container unless you amend the label, CSF, cite or submit additional product chemistry data, and provide more information on product packaging. The product as submitted and approved for registration is a 'me-too' of a pump-spray formulation.
- d) You have only listed mosquitoes and ticks on the label. Therefore, the reference to 'insects' has been deleted and replaced with mosquitoes. The "Do not inhale." statement was removed because it was not required. Revise the directions for use to read:

"Hold 4 to 6 inches from skin while spraying keeping nozzle pointed away from face. Slightly moisten the skin with a slow sweeping motion. Excessive amounts or frequent reapplication is unnecessary. Do not spray directly on face or in enclosed areas. To apply to face, spray small amounts on palms of hands and rub on face and neck. Do not apply to the hands of small children. Reapply every eight hours. Do not exceed two applications per day. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Do not apply under clothing. Apply sparingly around ears. Repels mosquitoes and ticks for up to eight hours."

- 3. Add a street address to the label for the registrant.
- 4. Revise the basic Confidential Statement of Formula (CSF) dated August 21, 2008 to reflect the change to the % active ingredient of the source product, which was recently amended by that registrant to increase the nominal picaridin content to 98.7%. This requires you to revise entries in Boxes 10 and 13. You will have to increase the %weight of one of the inert ingredients to compensate for the decreased %weight of the source product. Submit a revised CSF immediately.
- 5. Please submit three (3) copies of your final printed labeling before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

{Front Panel}

Natrapel 8 hour
INSECT REPELLENT
Continuous Spray

Long-Lasting Effective Mosquito Protection

Active Ingredient: Picaridin	20%
1-Methylpropyl-2 (2-hydroxyethyl)	
-1-piperidine carboxylate	
Inert Ingredients:	80%
Total	100%

Keep Out of Reach of Children

CAUTION: Stop and read this entire label before use.

Net Contents: (2), (4) or (6) fluid oz.

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 15 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

56575-15

{Back Panel}

PRECAUTIONARY STATEMENTS: Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco.

FIRST AID IF IN EYES:

- Hold eye open and rinse gently with water for 15-20 minutes
- Remove contact lenses, if present, after the first five minutes, and then continue rinsing.
- Call a poison control center or doctor for treatment advice.

FIRST AID IF SWALLOWED:

- Call a physician or poison control center immediately for treatment advice.
 - Have a person sip a glass of water if able to swallow.
 - Do not induce vomiting unless told to do so by Poison Control Center or a doctor.
 - Do not give anything to an unconscious person.
- Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PHYSICAL HAZARDS: Flammable. Do not use or store near heat sources, sparks or open flame. Contents under pressure do not puncture or incinerate container. Exposure to temperature above 130°F may cause bursting. Do not smoke while applying.

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read all Directions and Precautions on this Product Label prior to use.

Hold 4 to 6 inches from skin while spraying keeping nozzle pointed away from face. Do not inhale. Do not spray directly on face or enclosed areas. To apply to face, spray on hands and rub on. Slightly moisten with a slow sweeping motion. Excessive amounts or frequent reapplication is unnecessary. Do not apply to the hands of small children. Repels insects and ticks for up to eight hours. Reapply every 8 hours. Do not exceed two applications per day. Avoid contact with lips, cuts, wounds, or irritated skin. Do not apply to excessively sunburned skin. Do not spray directly on face. Do not apply under clothing. Apply sparingly around ears.

STORAGE & DISPOSAL: Store in a cool, dry place out of the reach of children. Keep away from heat, sparks and open flame. IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available. IF PARTLY FILLED: Call your local solid waste agency or 1-800-526-9377 for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 56575-()

EPA Est. 56575-NH-1



Littleton, NH 03561



Optional claims specific to packaging

1. New (claim would be valid for 6 months from date of the first product shipment with new packaging)
2. This Eco-Spray® Bottle uses a patented mechanical delivery system to create a continuous spray held in any position.
3. Continuous Spray
4. No Rubbing required
5. One Touch Pump
6. Easy Application
7. No Mess
8. Convenient, no mess, no rub protection
9. Sprays Upside Down



August 25, 2008

Mr. Richard Gebken
Product Manager 10
Document Processing Desk Distribution Code: APPL
Office of Pesticide Programs – (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Application for "Natrapel 8 Hour Insect Repellent Continuous Spray"

Dear Mr. Gebken

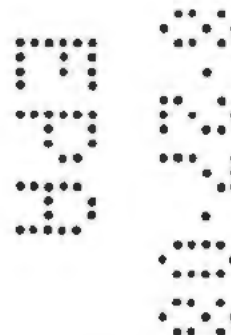
Enclosed is an application for Natrapel 8 Hour Insect Repellent Continuous Spray.
Specifically enclosed for this product are:

1. pay.gov acknowledgement of payment
2. Application (EPA Form 8570-1)
3. Certification with Respect to Citation of Data (EPA Form 8570-34)
4. Confidential Statement of Formula dated August 21, 2008 (EPA Form 8670-4)
5. Formulator's Exemption Statement (EPA Form 8570-27)
6. Five Copies of draft labeling
7. Lanxess Letter of Authorization Dated August 20, 2008
8. Two Copies of Data Matrix (EPA Form 8570-35) Agency Internal Use Copy
Pages 1 of 3, 2 of 3 and 3 of 3.
9. Two Copies of Data Matrix (EPA Form 8570-35) Public File Copy Pages 1 of 3,
2 of 3 and 3 of 3.

Please let me know if there is anything further that you need.

Sincerely,

Vern Schrum
Regulatory Affairs Manager
603-837-0200, vschrum@tendercorp.com





United States
Environmental Protection Agency
Washington, DC 20480

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 56575 - RL	2. EPA Product Manager Richard J. Gebken / 10	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Natranel 8 Hour Insect Repellent Continuous Spray	PM#	
5. Name and Address of Applicant (include ZIP Code) Tender Corporation Burndy Road Littleton, NH 03561 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 39967-53-56575 Product Name Natranel 8 Hour Insect Repellent	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2 to 6oz	No. per container 1 to 48
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2oz to 6oz	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper, glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Vern Schrum vschrum@tendencorp.com	Title Regulatory Affairs Manager	Telephone No. (Include Area Code) 603-837-0200	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Manager	 	
4. Typed Name Vern Schrum	5. Date Aug. 25, 2008		



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Tender Corporation 106 Burndy Road Littleton, NH 03561	EPA File Symbol/Registration Number 56575-
	Product Name Natrapel 8 Hour Insect Repellent Continuous Spray
	Date of Confidential Statement of Formula (EPA Form 8570-4) 08/21/2008

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Picaridin, 1-methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Picaridin, 1-methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate	[REDACTED]	[REDACTED]
Signature 	Name and Title Vern Schrum Regulatory Manager	Date 12/15/2008

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Tender Corporation 106 Burndy Road, Littleton NH, 03561	EPA Registration Number/File Symbol 56575
Active Ingredient(s) and/or representative test compound(s) Picaridin: (1-Methylpropyl-2-(2-hydroxyethyl)-1-peperidine carboxylate)	Date August 21, 2008
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)	Product Name Natrapel 8 Hour Insect Repellent Continuous Spray

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 8/22/08	Typed or Printed Name and Title Vern Schrum Regulatory Affairs Manager
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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Date 8/21/2008

EPA Reg No./File Symbol 56575

Page 1 of 3

Applicant's/Registrant's Name & Address

Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Chemical Identity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1600	Starting Material & Manufacturing Process	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1670	Discussion of Formulation of Impurities	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1700	Preliminary Analysis	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1750	Certified Limits	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.1800	Enforcement Analytical Method	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6302	Color	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6303	Physical State	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6304	Odor	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7200	Melting Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7220	Boiling Point	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7300	Density / Bulk Density	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7840	Solubility (Generation Elution)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7860	Solubility (Generation Column)	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7950	Vapor Pressure	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	

Signature

Name and Title

Vern Schrum

Regulatory Affairs Manager

Date

12/15/2008



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401 M Street, S.W.
WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address

Tender Corporation 106 Burndy Road, Littleton NH, 03561

Product

Natrapel 8 Hour Insect Repellent Continuous Spray

Ingredient (1-Methylpropyl-2-(2-hydroxyethyl)-1-piperidine carboxylate) CAS No.119515-38-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7370	Dissociation Constant	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7570	Octanol / Water Partition Coefficient	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7000	pH	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6313	Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6314	Oxidation / Reduction	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6315	Flammability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6316	Explosibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6317	Storage Stability	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.7100	Viscosity	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6319	Miscibility	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6320	Corrosion Characteristic	44408747-53	Lanxess Corporation EPA Co. No. 39967	EXC	
830.6321	Dielectric Breakdown Voltage	N/A	N/A		
158.340 GL REF	TOXICITY DATA REQUIREMENTS				
81-1	Acute Oral Toxicity-rat	44408748	Lanxess Corporation EPA Co. No. 39967	EXC	
81-2	Acute Dermal Toxicity	44408749	Lanxess Corporation EPA Co. No. 39967	EXC	

Signature

Name and Title

Vern Schrum

Regulatory Affairs Manager

Date

12/15/2008

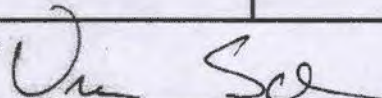


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WASHINGTON, D.C. 20460

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830.1300	Acute Inhalation Toxicity - Rat	45034002	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2400	Primary Eye Irritation - Rabbit	46885001	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2500	Primary Dermal Irritation	44408751	Lanxess Corporation EPA Co. No. 39967	EXC	
830.2600	Dermal Sensitization - G. Pigs	44408752	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040901	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040601	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040602	Lanxess Corporation EPA Co. No. 39967	EXC	
810.3700	Insect Repellent for Human Skin and Outdoor Premises	45040603	Lanxess Corporation EPA Co. No. 39967	EXC	
Signature 			Name and Title Vern Schrum Regulatory Affairs Manager		Date 12/15/2008